

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

**DEFENDANT TRANS UNION LLC'S NOTICE OF REMOVAL**

Pursuant to 28 U.S.C. §§ 1331, 1367, 1441, and 1446, Defendant Trans Union, LLC (“TransUnion”) hereby files this Notice of Removal of the above-captioned action to this Court on the following grounds:

1. TransUnion is a named Defendant in Index No. 707578/2025 filed by Plaintiff Sheikh Ahmad (“Plaintiff”) in the Supreme Court of the State of New York, County of Queens (the “State Court Action”).

2. The Summons with Notice in the State Court Action was filed with the Clerk of the Supreme Court of the State of New York, County of Queens on March 15, 2025.

3. This Notice is being filed with this Court within thirty (30) days after TransUnion received a copy of Plaintiff's initial pleading setting forth the claims for relief upon which Plaintiff's action is based.

4. This Court is the proper district court for removal because the State Court Action is pending within this district.

5. Pursuant to 28 U.S.C. § 1446(a), a copy of all process, pleadings, and orders served upon TransUnion in the State Court Action is attached hereto as **Exhibit A**.

6. Certain of the claims for relief against Defendants alleged in the State Court Action arise under the Fair Credit Reporting Act, 15 U.S.C. § 1681 *et seq.* Thus, this Court has original subject matter jurisdiction over the above-captioned action pursuant to 28 U.S.C. § 1331 and 15 U.S.C. § 1681p. The above-captioned action may properly be removed to this United States District Court pursuant to 28 U.S.C. § 1441(a).

7. TransUnion is the only named Defendant in this case.

8. Promptly after the filing of this Notice of Removal, TransUnion shall provide notice of the removal to Plaintiff through his attorney of record in the State Court Action, and shall file a copy of this Notice with the clerk of the court in the State Court Action, as required by 28 U.S.C. § 1446(d). *See Exhibit B.*

**BUCHANAN INGERSOLL & ROONEY PC**

By: /s/ Andrew Hope  
Andrew G. Hope (NY Bar ID 4913547)  
Two Liberty Place  
50 S. 16th Street, Suite 3200  
Philadelphia, PA 19102  
T: 215-665-8700  
[andrew.hope@bipc.com](mailto:andrew.hope@bipc.com)

Dated: April 22, 2025

*Counsel for Defendant Trans Union, LLC*

**CERTIFICATE OF SERVICE**

I, Andrew G. Hope, hereby certify that on April 22, 2025, the foregoing document has been electronically filed. Notice of this filing will be sent by operation of the Court's electronic filing system. Parties may access this filing through the Court's electronic filing.

**BUCHANAN INGERSOLL & ROONEY PC**

By: /s/ Andrew Hope  
Andrew G. Hope (NY Bar ID 4913547)  
Two Liberty Place  
50 S. 16th Street, Suite 3200  
Philadelphia, PA 19102  
T: 215-665-8700  
andrew.hope@bipc.com

Dated: April 22, 2025

*Counsel for Defendant Trans Union, LLC*